

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA



UNITED STATES OF AMERICA :  
 :  
 v. : 1:21CR 63 -1  
 :  
 UMESH CHANDRA PURI :

The Grand Jury charges:

COUNT ONE

BACKGROUND ALLEGATIONS

1. UMESH CHANDRA PURI is currently a naturalized citizen of the United States of America. Prior to becoming a naturalized United States citizen UMESH CHANDRA PURI was a citizen of Nepal.

2. The laws of the United States of America provide that a citizen of a foreign country may apply for citizenship. To become a naturalized citizen the applicant must satisfy criteria set by law, including length of residence in the United States, and that the applicant be of good moral character.

3. Citizens of a foreign nation seeking to become naturalized United States citizens must submit a Form N-400 Application For Naturalization ("Form N-400") to United States Citizenship and Immigration Services ("USCIS"). The Form N-400 requires the applicant to provide information to

USCIS certified under penalty of perjury that allow USCIS officers to determine if the applicant is qualified to become a naturalized citizen.

4. At all times material herein, the Form N-400 required the applicant to answer questions pertaining to his or her background including questions about the applicant's criminal record and criminal activities. Form N-400 requires the applicant to provide information as to any crimes the applicant has committed for which he or she has not been arrested. The information provided by the applicant as to crimes for which the applicant has not been arrested would be material to the determination by USCIS whether to grant or deny the request for naturalization.

5. Following receipt of the Form N-400, the applicant must appear before a USCIS officer and, under oath and penalty of perjury, certify that the contents of the Form N-400 are true and correct.

6. Based on the information provided in the Form N-400, the interview with a USCIS officer, and any further investigation carried out by USCIS officers, USCIS determines whether the applicant is qualified to be naturalized.

7. Upon being naturalized, each new citizen is provided with a USCIS Form 550 Certificate of Naturalization which provides evidence of their status as naturalized citizens of the United States.

8. The United States Department of State provides passports to citizens of the United States, including naturalized citizens, for the purpose of proving citizenship in relation to foreign travel and to facilitate such foreign travel.

9. American citizens requesting issuance of a passport must fill out a Form DS-11 Application for a U.S. Passport ("Form DS-11") and submit the DS-11 to the State Department for review.

10. Form DS-11 requires that the applicant provide proof of his or her United States Citizenship. A naturalized United States Citizen may provide his or her Form 550 Certificate of Naturalization as sufficient proof of citizenship.

11. An applicant for a passport must sign the Form DS-11 under penalty of perjury and certify that he or she did not include any false documents in the application.

12. On or about March 29, 2010, in Orange County, California, UMESH CHANDRA PURI executed a Form N-400 requesting that he be naturalized as a citizen of the United States. UMESH CHANDRA PURI signed the Form N-400 and certified that the Form N-400 and the evidence submitted with it were true and correct. UMESH CHANDRA PURI submitted

his executed Form N-400 to USCIS to procure naturalization as a citizen of the United States.

13. Question 15 on the Form N-400 executed by UMESH CHANDRA PURI asks "Have you **ever** committed a crime or offense for which you were **not** arrested" (emphasis in the original).

14. In response to Question 15 on the Form N-400 as to whether he had committed or attempted to commit crimes for which he had not been arrested, UMESH CHANDRA PURI falsely and fraudulently answered "No," when in fact, as UMESH CHANDRA PURI then well knew, he had committed sexual crimes against a minor.

15. On or about July 9, 2010, a USCIS officer interviewed UMESH CHANDRA PURI as to his request for naturalization and his Form N-400. At this interview UMESH CHANDRA PURI again falsely certified under penalty of perjury that the contents of his Form N-400 were true and correct, when, as UMESH CHANDRA PURI then well knew, he had answered Question 15 falsely.

16. On or about August 20, 2010, in Los Angeles, California, UMESH CHANDRA PURI appeared at a USCIS office to complete the naturalization process. Before taking the oath of citizenship, UMESH CHANDRA PURI executed and submitted a Form N-445 Notice of Naturalization Oath

Ceremony ("Form N-445"). UMESH CHANDRA PURI executed and signed the Form N-445 certifying that all his answers on the Form N-445 were true and correct.

17. Question 3 asked whether, after the date of the interview on the Form N-400, "Have you knowingly committed any crime or offense, for which you have not been arrested?" UMESH CHANDRA PURI falsely answered Question 3 "No," when in fact, as he then well knew, he had committed sexual crimes against minors after the date of his interview on the Form N-400.

18. Based on his false Form N-400 and false Form N-445, USCIS granted UMESH CHANDRA PURI's request for naturalization and UMESH CHANDRA PURI was naturalized and granted United States Citizenship on August 20, 2010 and was provided Form N-550 Certificate of Naturalization, Number 32733418.

19. UMESH CHANDRA PURI'S false response to Question 15 on his Form N-400 and his false answer to Question 3 on his Form N-445 were material to the determination by USCIS officers that UMESH CHANDRA PURI was of good moral character and qualified to be naturalized.

20. On or about July 15, 2015, a four-count criminal complaint was issued against UMESH CHANDRA PURI in the Superior Court of Orange County, California, charging UMESH CHANDRA PURI with sexual crimes

against minors in violation of the laws of the State of California between February 11, 2005 and May 15, 2015.

21. On or about November 2, 2015, in the Superior Court of Orange County, California, UMESH CHANDR PURI pleaded guilty to continuous sexual abuse of a child from 2/11/05 to 2/10/13, as well as other sexual crimes against minors, in violation of the law of the State of California.

22. On or about August 4, 2020, in Guilford County, North Carolina, UMESH CHANDRA PURI signed and submitted a Form DS-11 applying for issuance of a U.S. Passport. As evidence of his citizenship UMESH CHANDRA PURI submitted the falsely obtained Form N-550 Certificate of Naturalization, Number 32733418. In executing the Form DS-11, UMESH CHANDRA PURI declared under penalty of perjury that he had not knowingly included any false documents in support of his Form DS-11 application, when, as UMESH CHANDRA PURI then well knew, he had attached the false and fraudulently obtained Form N-550, Certificate of Naturalization, Number 32733418, to the application.

23. On or about September 10, 2020, based on the presentation of the false and fraudulently obtained Form 550, Certificate of Naturalization, Number 32733418, the United States Department of State issued UMESH CHANDRA PURI United States Passport, Number 655874556.

24. The presentation of the falsely and fraudulently obtained Certificate of Naturalization, Number 32733418, by UMESH CHANDRA PURI was material to the decision of United States Department of State officers to issue UMESH CHANDRA PURI a United States passport.

25. On or about August 4, 2020, in the County of Guilford, in the Middle District of North Carolina, UMESH CHANDRA PURI knowingly procured and obtained, and attempted to procure and obtain, contrary to law, documentary evidence of United States citizenship, that is, United States Passport, Number 655874556, by attaching a falsely and fraudulently obtained Form 550, Certificate of Naturalization, Number 32733418, to his Form DS-11 Application of United States Passport and then falsely certifying under penalty of perjury that he had not knowingly included any false documents in support of his Form DS-11 application, when, as UMESH CHANDRA PURI then well knew, he had attached the false and fraudulently obtained Form N-550, Certificate of Naturalization, Number 32733418, to the application.

All in violation of Title 18, United States Code, Section 1425(b).

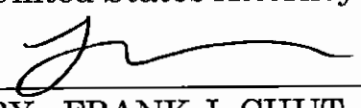
## COUNT TWO

1. The Grand Jury hereby realleges Paragraphs One through Twenty-Four of Count One as if fully set forth herein.

2. On or about August 4, 2020, in the County of Guilford, in the Middle District of North Carolina, UMESH CHANDRA PURI willfully and knowingly made a false statement in a Form DS-11 Application for a United States Passport with intent to secure and obtain for his own use the issuance of a passport under the Laws of the United States contrary to the laws regulating the issuance of such passports and rules prescribed pursuant to such laws, in that in such application UMESH CHANDRA PURI, stated, under penalty of perjury, that he had attached and included no false documents, when, as UMESH CHANDRA PURI, then well knew, such statement was false as he had attached and provided a false and fraudulently obtained Form N-550, Certificate of Naturalization, Number 32733418, to the DS-11 Application for a United States Passport; in violation of Title 18, United States Code, Section 1542.

DATED: February 22, 2021

MATTHEW G.T. MARTIN  
United States Attorney

  
BY: FRANK J. CHUT, JR.  
Assistant United States Attorney

A TRUE/BILL;

  
FOREPERSON